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acting pro se

FILED
JUN 16 2015
RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

UNITED STATES DISTRICT COURT

for the

Northern District of California

THE WAVE STUDIO, LLC, A New York
Limited Liability Company

Plaintiff,

v.

VISITUSA, LLC, a Utah Limited Liability
Company.

Defendant.

MOTION TO DISMISS

Civil Action 15-cv-01341 LHK

As the incorporator and owner of VisitUSA LLC, a single member LLC, I hereby move that the suit against VisitUSA, LLC filed by The Wave Studio, LLC be dismissed per 12(b)(2) of the Federal Rules of Civil Procedure: lack of personal jurisdiction.

VisitUSA, LLC has never, either through itself or through affiliated entities, owned, used and/or provided content for the domain name *travelaffiliatepro.com*. During all relevant time periods, neither VisitUSA, LLC nor any of its affiliated companies has transacted or solicited any business in the Northern District of California through the website *travelaffiliatepro.com*.

Perhaps the Plaintiff has confused VisitUSA, LLC with the web-site Visitusa.Com. They are not the same entity, nor are they affiliated. Visitusa.Com is not owned by me (David Urmann) nor is it in any way part of or affiliated with VisitUSA, LLC.

Furthermore, VisitUSA, LLC never acquired much in the way of assets and no longer even exists.

DATED this 12 day of June, 2015.



CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing **motion to dismiss** was mailed on the

12th day of June, 20015 to the following:

The Honorable Lucy H. Koh
United States District Court
Northern District of California, San Jose Division
280 S. 1st Street, 2nd Floor
San Jose, CA 95113

Vijay Toke
Cobalt LLP
918 Parker Street, Bldg. A21
Berkeley, CA 94710

British Airways PLC
2 Park Ave., Suite 1100
New York, New York 10016

Hotels Combined LLC
Valis Group, Inc.
501 Silverside Road, Suite 105
Wilmington, Delaware 19809

Swiss International Air Lines Ltd.
818 West Seventh Street, 2nd Floor
Los Angeles, California 90017

Travix Travel USA Inc.
333 W. Santa Clara St., Suite 800
San Jose, California 95113



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